

EXHIBIT

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**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

AMERICAN CIVIL RIGHTS UNION,)
in its individual and corporate capacities,)
)
 Plaintiff,)

v.)

Civil Action No. 7:16-cv-00103

ELECTION ADMINISTRATOR)
JOHN RODRIGUEZ, in)
in his official capacity, and)
TEXAS SECRETARY OF STATE)
ROLANDO PABLOS, in his)
official capacity.)
 Defendants.)

**Plaintiff's First Supplemental Responses to
Defendant Rodriguez's First Set of Interrogatories**

COMES NOW American Civil Rights Union, Plaintiff in the above-captioned case, and makes its supplemental responses to Defendant Rodriguez's First Set of Interrogatories pursuant to Federal Rules of Civil Procedure 26 and 33.

INTERROGATORY NO. 6

Identify all the voters registered to vote in Starr County from 2010 through 2016 who you claim are/were not eligible to vote in the County.

OBJECTION: Plaintiff objects to Interrogatory No. 6 in so far as it is unduly burdensome and overbroad. Plaintiff further objects to the extent the information requested is in the control of Defendant Rodriguez.

Subject to and without waiving the above objection(s), and while reserving the right to supplement in accordance with the Federal Rules of Civil Procedure, Plaintiff answers as follows:

Plaintiff lacks present knowledge to respond to Interrogatory No. 6 until such time as Defendant provides requested documents related to registrants on the voter rolls.

SUPPLEMENT: Subject to and without waiving the above objection(s), and while reserving the right to supplement in accordance with the Federal Rules of Civil Procedure, Plaintiff answers as follows:

Plaintiff maintains that the information requested is in the control of Defendant Rodriguez. Publicly available data shows that Starr County previously did and continues to have more people registered to vote than eligible citizens in the county. *See* Declaration of Steven Camarota. Further, Plaintiff has identified multiple registrants that are likely deceased, duplicates, registered at the age of 16 or younger, or registered with “unavailable” residential addresses. *See* ACRU-000762-64. *See also*, Declaration of Donald Palmer. Further, documents produced by Defendant Rodriguez in discovery show myriad concerns about the eligibility of registrants who were permitted to remain on the Starr County voter roll. *See* D-00323-9501.

Dated: December 6, 2017

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**Admitted Pro Hac Vice*

VERIFICATION


State of Tennessee

City of Nashville

Before me, the undersigned Notary Public, on this day personally appeared Susan Carleson, who being first duly sworn on oath deposes and says that she has read the foregoing Supplemental Responses to Defendant Montalvo's First Set of Interrogatories, that she has personal knowledge of the facts stated in said Responses, and that they are true and correct.


Susan Carleson

SUBSCRIBED AND SWORN TO before me the undersigned Notary Public on this
6TH day of December, 2017


Notary Public, In and For the State of Tennessee

My Commission expires:

08-20-2019



CERTIFICATE OF SERVICE

I hereby certify that on December 6, 2017, I served the foregoing on counsel of record below by electronic mail and U.S. Mail addressed as follows:

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